

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

D'LESIA CHAMBERS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 6:15-cv-03074 MDH
)	
DYLAN CORPORATE SERVICES,)	
INC. and ROBERT J. ECKHOLT,)	
)	
Defendants.)	

JOINT DISCOVERY STATUS REPORT

COMES NOW Plaintiff, through counsel, filing this Joint Discovery Status Report for the period ending October 27, 2015, with defense counsel consent, as required by the Court's Scheduling and Trial Order.

1. Mediation was held on July 21, 2015, and the parties filed their Mediation Report thereafter. The mediation was unsuccessful.
2. Discovery was advanced at the mediation as the parties voluntarily exchanged additional documentation.
3. On July 17, 2015, the Plaintiff filed responses and objections to Defendants' Request for Production of Documents and Interrogatories; produced several hundred pages of documentation to Defendants in responses to Defendants' Request for Production of Documents; and answered all but four (4) of Defendants' twenty-one (21) Interrogatories containing several subparts. Several of those answers were subject to objections.
4. On that same day, Plaintiff also filed a Supplemental Rule 26a Disclosure.

5. On August 17, 2015, counsel for Plaintiff and Defendants discussed the resolution of the discovery objections.

6. On July 27, 2015, Plaintiff served its Second Request for Production of Documents upon both Defendants.

7. On August 26, 2015, Defendants filed their Responses and Objections to Plaintiff's Second Request for Production of Documents to each Defendant.

8. On October 23, 2015, Plaintiff file her Supplemental Responses to Defendant Robert Eckholt's First Request for Production of Documents to Plaintiff D'Lesia Chambers.

9. On October 23, 2015, Plaintiff filed Supplemental Disclosures Pursuant to Rule 26(a).

10. The parties are also in the middle of scheduling the deposition of Defendants for late November or early December, 2015 and Plaintiff thereafter.

11. Plaintiff's expert reports are currently due November 30, 2015, and the parties are discussing an extension of that deadline so that Defendants' and Plaintiff's depositions are taken prior to the respective filing of those expert reports and identification of experts.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a complete copy of the foregoing document was served upon the attorneys of record for each party to the above action via electronic filing with the U.S. District Court, Southern Division of the Western District of Missouri on the 27th day of October, 2015.

/s/ Joseph D. Sheppard, III
Attorney of Record



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